

Doe, Jane 1-4 Vs. Red Roof Inns, Inc.

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1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF GEORGIA

ATLANTA DIVISION

**PL Sum. J.****Ex. 004**

3  
4 JANE DOE 1-4,  
5 Plaintiffs,

CIVIL ACTION NO.:

6 vs.

1:21-CV-04278-WMR

7 RED ROOF INNS, INC., et al.,  
8 Defendants.

9  
10  
11 C O N F I D E N T I A L

12 VOLUME II

13 CONTINUATION OF THE VIDEO DEPOSITION OF

14 JANE DOE 2

15 August 29, 2022

16 9:12 a.m.

17 1960 Satellite Boulevard, Suite 4000

18 Duluth, Georgia

19 Carolyn M. Carboni, RPR, RMR, CCR-B-878

20 Leo Mileman, Videographer  
21  
22  
23  
24  
25

## 1 APPEARANCES OF COUNSEL:

2 On behalf of Jane Doe 2 Plaintiff and Plaintiffs in  
3 W.K., et al. v. Red Roof Inns, et al. case:

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10 On behalf of the Defendants Red Roof Inns, Inc.;

11 FMW RRI NC, LLC; Red Roof Franchising, LLC; RRI

12 West Management, LLC; Westmont Hospitality Group,

13 Inc.; and RRI III, LLC:

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19 On behalf of the Defendant Varahi Hotel, LLC:

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3 W.K., et al. v. Red Roof Inns, et al. case:

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1           A     High school friends. I was also 17 in  
2     that photograph.

3           Q     Okay. So this was before any of your  
4     alleged trafficking?

5           A     Yes, ma'am.

6           Q     All right. And that's Bates number  
7     JD2-3876.

8                     Okay. And then the next is also in 18,  
9     that's JD2-3910. Who's in this photo?

10          A     A couple of the girls that I worked with  
11     at the strip club called Deja Vu in Sacramento.

12          Q     Okay. And this was also before your  
13     alleged trafficking?

14          A     Yes.

15          Q     And then this is the next photo, the Bates  
16     number is cut off, but can you tell me what's going  
17     on in this photograph?

18          A     Yes. So CB had took us to the mall to get  
19     these shirts made at a kiosk. It was like his  
20     little -- his group's, like, slogan or what have  
21     you. And he made me and the girls he had at the  
22     time, I remember it being [REDACTED], I think there  
23     was another girl there, I don't really recall her  
24     name at the time, but we all had to get shirts  
25     made. And he was taking a picture of the shirt to

1 send to his guy friends.

2 Q Okay. Did you wear these shirts out?

3 A When he wanted us to.

4 Q The next photo, who's in this photograph?

5 A One of the girls that CB had been  
6 trafficking alongside me. And she one day just  
7 disappeared. I don't know what happened to her.  
8 She went with a customer and then never came back.

9 Q She disappeared?

10 A (Witness nods head.)

11 Q This was another victim of sex  
12 trafficking?

13 A Yes, under CB.

14 Q Do you remember her name?

15 A No.

16 Q How long was she with you guys?

17 A Not that long, but also not a very short  
18 moment. I really don't remember, but I do remember  
19 her being there.

20 Q But just suddenly she was gone?

21 A Yeah. I just remember her going to one of  
22 her calls, and she never came back from it. And CB  
23 was pissed.

24 Q Did CB ever go after this woman?

25 A I believe he tried to go to the address

1           A       It's hard to pinpoint an exact time or  
2       date. I have -- I really don't have any  
3       recollection of when that might have been. But I  
4       believe, to my knowledge, if I'm correct or not,  
5       she was walking down in a really bad part of town,  
6       in what they refer to as The Bluffs, and he had  
7       asked her if she needed a ride. She said yes. She  
8       hopped in the car, and that was it from there.

9           Q       Where is The Bluff?

10          A       Vine City.

11          Q       And you said this was earlier on in your  
12       trafficking, so 2013 probably?

13          A       Definitely.

14          Q       Okay. And I know I'm jumping around a  
15       little bit, but Jane Doe 4 was the person that you  
16       met outside of the hotel that first brought you to  
17       CB, correct?

18          A       Correct.

19          Q       Did you ever see Jane Doe 4 after that?

20          A       Never again.

21          Q       This is the next photograph. Who is this?

22          A       That was a girl that Kwan knew. She would  
23       sometimes come over and, like, help him with the  
24       girls and get -- bring them dates, kind of like the  
25       girl that I mentioned named Black, I forget her

1 the name.

2 Q Okay. Thank you for that. And I just  
3 wanted to clarify quickly, when we're talking about  
4 Jane Doe 4 who you met outside the Microtel and  
5 then never saw again, introduced you to CB, is that  
6 [REDACTED] or [REDACTED]?

7 A [REDACTED].

8 Q Okay. And then I'm going to mark this  
9 Jane Doe 2-21.

10 (Exhibit JD2-21 marked.)

11 BY MS. FENNELLY:

12 Q Have you seen this before?

13 A Yes, at my last deposition.

14 Q And what is it?

15 A A record for one I attended, Gilgal.

16 Q And what is that? What is Gilgal?

17 A It's a place you go to for, like, a sober  
18 living residential place for women that are  
19 homeless with addictions.

20 Q And it says you were there for just one  
21 day or like one overnight --

22 A Correct.

23 Q -- in October of 2013.

24 That was when you were allegedly  
25 trafficked, correct?

1 give you back to your traffickers again?

2 A At the time, all I was thinking about was  
3 getting my next fix. I mean, I'm not going to --  
4 I'm not going to lie, I wasn't even thinking about  
5 any of that. I just wanted to feel right again.

6 MS. FENNELLY: Okay. I think I'm almost  
7 done, but if we could go off the record for a few  
8 minutes.

9 THE VIDEOGRAPHER: Off the video record at  
10 10:44 a.m.

11 (Recess from 10:44 to 10:59 a.m.)

12 THE VIDEOGRAPHER: Back on the video  
13 record at 10:59 a.m.

14 BY MS. FENNELLY:

15 Q I want to turn specifically to the  
16 Buckhead Red Roof Inn. Do you know what I'm  
17 talking about when I say the Buckhead Red Roof Inn?

18 A North Druid Hills?

19 Q North Druid Hills, correct.

20 Can you describe that hotel generally for  
21 me?

22 A So when you get off of the North Druid  
23 Hills exit and you're coming up to Buford Highway,  
24 it sits on the top of a hill, kind of ish, like on  
25 the right-hand corner of when you make a right on

1 to Buford Highway from North Druid Hills.

2 When you first go into the parking lot, it  
3 sits a little far -- a little ways back, and the  
4 building, you come into the parking lot, it sits  
5 this way (indicating). The front office is about  
6 right here in the corner, and you can go this way  
7 and then around this parking like that  
8 (indicating).

9 Q Okay. Were the rooms --

10 A On the outside.

11 Q They were on the outside, so you don't  
12 have to go through the lobby to get to your room;  
13 you can go through the parking lot, correct?

14 A Correct.

15 Q Is there a location you guys would  
16 typically stay at that hotel?

17 A No.

18 Q It was kind of all over?

19 A Yes.

20 Q How many stories were there?

21 A Three.

22 Q And there wasn't, again, a particular  
23 floor you guys would always stay on?

24 A No.

25 Q How many times do you think you stayed

1       there?

2           A       I'm not sure. I know I frequented there a  
3       lot, though.

4           Q       If you had to give a ballpark estimate of  
5       how many times?

6           A       I don't remember.

7           Q       More than five?

8           A       Definitely more than five.

9           Q       More than 10?

10          A       Yeah. Less than 30, maybe a little more.  
11       I'm not sure. Probably -- I would say more like 50  
12       or less because it was one of the ones we  
13       frequently more.

14          Q       Do you remember the first time you were  
15       ever there?

16          A       No, I don't.

17          Q       Okay. How many nights would y'all stay  
18       each time that you would stay there?

19          A       I'm not sure. But I know that any hotel I  
20       ever stayed at, normally, we would only stay, like,  
21       at the most, three nights at the most.

22          Q       Okay. Do you recall any specific --

23                   MR. TONGE: Try not to rock the chair.

24                   THE WITNESS: Oh, I'm sorry.

25                   MR. TONGE: Sorry.

1 Q -- was really going on?

2 A He did.

3 Q Why do you believe that?

4 A Well, one, I straight up told him; and  
5 two, like, there -- I said it before, there were  
6 signs and girls that look a certain type of way,  
7 and if he's there all the time and he's putting  
8 rooms together for that many people on a consistent  
9 basis, you're going to run into it, voluntary and  
10 involuntary. And if you don't know the difference,  
11 I mean, and you want to sit there and say you  
12 don't, then you're ignorant.

13 Q What -- for someone that's not involved in  
14 the -- in trafficking, what are the signs that an  
15 outsider should notice that differentiate between  
16 prostitution and sex trafficking?

17 A No eye contact, you know, being able  
18 to meet with anyone, especially other men, you  
19 know, very low self-esteem, kind of walking  
20 outside, always keeping their head down, very kept  
21 to themselves.

22 A girl that is there that does not feel  
23 like she's being trapped or has to, you know, watch  
24 what she does and be careful because she, you know,  
25 has to watch her every move because her, you know,

1 her next beating might be five minutes away, will,  
2 you know, just be bubbly and friendly and be like,  
3 oh, you know, this is like -- this is what I like  
4 to do.

5 Like, I've met girls that have been  
6 prostitutes that enjoy doing it, you know, because  
7 maybe they're sex addicts or whatever. I don't  
8 know. But there's a big difference between a girl  
9 that is there and likes doing that stuff and is  
10 there and is scared and not wanting to be there and  
11 doesn't know what to do because she feels trapped.

12 Q And you've been in both of those  
13 situations, correct, where you've been there  
14 voluntarily and you've been there involuntarily?

15 A I mean, not how I just described it,  
16 because I did it more because of survival. I felt  
17 like it was the quickest way to make money. It's  
18 not something I definitely enjoy doing at all  
19 whatsoever. But yes, I have definitely been in  
20 both of those situations.

21 Q When was the last time you had commercial  
22 sex, whether it was voluntary or involuntary?

23 A Before I was pregnant with my son.

24 Q Okay. Which I think we said he was born  
25 in 2016?

1 A Yes.

2 Q How many times do you think you stayed at  
3 the Red Roof in Smyrna?

4 A Not a lot. Just like a handful of times.  
5 There are times that I would go there to drop off  
6 drugs to Ant and Megan and would stay for an hour  
7 or two and then leave. And there were times I  
8 would stay there for the whole entire day and use  
9 the room to work while Kwan had to go do things by  
10 himself, so...

11 Q And then would it be the same, about one  
12 to three nights every time you would stay, more or  
13 less?

14 A Oh, no, no, no. It would just be for the  
15 day.

16 Q For the day, okay.

17 A Because I didn't have a room there.  
18 Neither did Kwan. He had to go take care of some  
19 personal business and would drop me off to them.

20 Q So you were staying in somebody else's  
21 room; you never checked into that hotel?

22 A Correct.

23 Q Okay. What about at the Red Roof in  
24 Buckhead, would you check into that hotel?

25 A Yes.

1 Q The Days Inn was on Northside?

2 A Uh-huh.

3 Q Yes?

4 A Yes.

5 Q Okay. Where did y'all go once you were  
6 with Kwan?

7 A I don't remember to be exact. I assume a  
8 hotel because that's where we stayed out of was  
9 hotels. I don't remember exactly which one.

10 Q All right. And you said this was in 2013.  
11 And how long were you with Kwan before you were  
12 with Masaba?

13 A Give or take, six or eight months.

14 Q All right. When you were with Kwan, were  
15 you ever subjected to sex trafficking at the Red  
16 Roof Inn Smyrna?

17 A He took me and dropped me off with Ant  
18 Shivers and [REDACTED] to work out of their room  
19 whenever he had personal business privately he had  
20 to take care where I couldn't accompany him on.

21 Q Was that the only situations when you were  
22 at the Red Roof Inn Smyrna when you were under  
23 Kwan?

24 A Unless we were dropping off drugs to them,  
25 that's the only situation I was working out of

1 Q We know -- I think from your testimony  
2 we've been able to, it seems, put a more definitive  
3 time on when you were at the Microtel and first got  
4 involved with CB in March of 2013, correct?

5 A Correct.

6 Q All right. And tell me again, as best as  
7 you can, the length of time period you were under  
8 CB before you got away to the Days Inn?

9 A Give or take, like six or eight months.

10 Q In your mind, do you remember it being  
11 about the same amount of time that you were under  
12 CB that you were under Kwan?

13 A No, I don't. But I think that's about --  
14 they shared the same amount of time, honestly,  
15 because that's the only way it makes sense. But in  
16 my mind, it seemed extremely a lot longer than  
17 that.

18 Q Yeah. Because I think you've told us that  
19 based on the things that you've looked at in trying  
20 to relive this, that what I -- I've heard this six  
21 to eight months in reference to Kwan and in  
22 reference to CB.

23 A Correct.

24 Q Do you agree with that?

25 A Right.

1 Q Okay. And understanding that you think it  
2 feels different between those two men; is that  
3 fair?

4 A I mean, yeah. They definitely both seemed  
5 longer than they actually were.

6 Q I see. Okay. All right. And so if you  
7 first met CB in March of 2013, and taking the  
8 lesser amount of six months, it would be sometime  
9 in the, you know, September, fall of 2013; you  
10 agree with that math, right?

11 A I'm not good at math, so sure, I guess.

12 Q All right. But from March, and six months  
13 later, that's September, correct?

14 A I think so.

15 Q Okay. And then if we take, you know,  
16 eight months, that would be in November of 2013,  
17 correct?

18 A Uh-huh.

19 Q Okay. And so as best as you can remember  
20 and if we -- now we're going to have to get some  
21 real ranges. All right. So between six and eight  
22 months with CB and six and eight months with Kwan,  
23 correct?

24 A Correct.

25 Q And there was a period you told us when

1 you were away from the both of them at the Days  
2 Inn. How long were you at the Days Inn?

3 A No less than three, no more than five.

4 Q Days?

5 A Correct.

6 Q Okay. All right. So there was a period  
7 of between three and five days when you were with  
8 neither, correct?

9 A Correct.

10 Q All right. Tell me about what you can  
11 remember of the times when you were dropped off at  
12 the Red Roof Inn Smyrna while with Kwan, and  
13 Anthony essentially babysat you while you were  
14 seeing johns there.

15 A I remember [REDACTED] having her little dog,  
16 Chihuahua, that lived there with her. Like, they  
17 stayed at the Red Roof a lot. And to my knowledge,  
18 I believe they stayed in the same room a lot, too.  
19 I think they only changed, like, a handful of times  
20 that I knew of.

21 I just remember the room always smelling  
22 like dog, and it was really gross. And I had had  
23 actually lost a couple of clients because of that  
24 one time.

25 And having to, like, just work around her

1 really, like, kind of -- like, he was like one of  
2 those kind of like -- kind of like nerdy kids that,  
3 like, thought he felt really cool and, like, really  
4 took a lot into that job and made him feel like he  
5 was important, so to speak. Like -- almost -- not  
6 like a power trip per se, like, because he wasn't  
7 super cocky or anything like that. But you can  
8 definitely -- you can definitely kind of see, like,  
9 a ego thing going on there with the position and  
10 the role he played within the whole hotel thing  
11 and, you know, doing what he did for everybody.

12 Q And you saw and determined all that from  
13 the two times that you had seen him?

14 A Yeah. I consider myself a pretty good  
15 judge of character, like, being able to see how  
16 people are. I mean, I don't know, that's just me.

17 Q But not with boyfriends?

18 A Definitely not.

19 Q Okay. Other be -- other than -- well, let  
20 me put it this way: Can you describe Forrest's  
21 physical appearance at all?

22 A Like I said, I only seen him twice, and it  
23 was so long ago, I really don't remember.

24 Q All right. Other than being a kind of  
25 nerdy kid and young and somebody who, I think as

1     you said, seemed to have a little bit of an ego,  
2     like he felt like his job was important or he  
3     seemed to think it was, anything else you can  
4     remember about him?

5           A     Huh-uh.

6           Q     No?

7           A     I think he had dark hair at that time, but  
8     I'm not sure.

9           Q     How about race, height, weight?

10          A     He's white.

11          Q     Huh?

12          A     He's white.

13          Q     Okay. Any tattoos or anything like that,  
14     do you remember?

15          A     No.

16          Q     All right. And do you remember -- in  
17     terms of when you had, I think you described it in  
18     your first deposition, like a heart to heart with  
19     Forrest, do you remember saying that?

20          A     Yeah. I mean, he might even be, like,  
21     Italian, or he might even be, like, mixed or  
22     something. Kind of, like, how I'm white/Hispanic,  
23     like, he's got something in him. I'm just not sure  
24     exactly what it is.

25          Q     Okay. And I know you don't know when it

1 was exactly, but in terms of the time period, the  
2 six to eight months that you were with Kwan, do you  
3 remember having this discussion with Forrest more  
4 towards when you were first with Kwan or more  
5 towards when you were leaving Kwan and then got to  
6 Kentucky and then Masaba?

7 A Like the middle-ish.

8 Q Towards the middle?

9 A (Witness nods head.)

10 Q Okay. What was the name of the place in  
11 Kentucky that you went?

12 A Oh, I don't remember.

13 Q How was it -- do you remember where in the  
14 state?

15 A I believe Nicholasville.

16 Q Okay. And do you remember the buildings  
17 being in, like, a horseshoe sort of shape  
18 arrangement?

19 A It was a house.

20 Q It was just one house?

21 A Yeah.

22 Q Okay.

23 A Like a two-story house.

24 Q Okay. And so we were talking about how it  
25 is you went from Kwan to Masaba. You mentioned you

1 13. [REDACTED] ex-boyfriend by the name of [REDACTED]  
2 also in 16. I believe that [REDACTED] is also  
3 17, if I'm not mistaken.

4 (Exhibit JD2-31 marked.)

5 BY MR. REAM:

6 Q All right. Let me hand you an Exhibit 31.  
7 This will be the last --

8 A And I thought for a second that 5 was CB  
9 because they look like the same person, but --

10 Q Hang on, [REDACTED]. I'm not asking you  
11 a question at the moment.

12 A That's actually Forrest.

13 Q Number 31, do you see this notebook page?  
14 Do you see it in front of you?

15 A I'm looking at it, yes.

16 Q Okay. Do you recognize this?

17 A No, I do not.

18 Q Do you know where this is from?

19 A It looks like a notebook.

20 Q Do you know where it's from?

21 A It looks like a notebook.

22 Q Do you know who wrote this?

23 A No, I do not. I know it was my notebook,  
24 and there's a couple of different people who have  
25 wrote in this notebook before.

Doe, Jane 1-4 Vs. Red Roof Inns, Inc.

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## CERTIFICATE

STATE OF GEORGIA:

COUNTY OF FULTON:

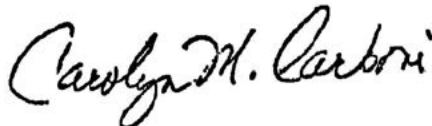
I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the colloquies, questions and answers were reduced to typewriting under my direction; that the transcript is a true and correct record of the evidence given upon said proceeding.

I further certify that I am not a relative or employee or attorney of any party, nor am I financially interested in the outcome of this action.

I have no relationship of interest in this matter which would disqualify me from maintaining my obligation of impartiality in compliance with the Code of Professional Ethics.

I have no direct contract with any party in this action and my compensation is based solely on the terms of my subcontractor agreement.

Nothing in the arrangements made for this proceeding impacts my absolute commitment to serve all parties as an impartial officer of the court. This the 3rd day of September, 2022.



---

CAROLYN M. CARBONI, RPR, RMR, CCR-B-878